

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust  
Litigation*, MDL 2817

No. 1:18-CV-00864

This document relates to:

Hon. Robert M. Dow, Jr.

*Motor Vehicle Software Corp. v. CDK Global,  
LLC, et al., Case No. 1:18-cv-00865 (N.D. Ill.)*

Magistrate Judge Jeffrey T. Gilbert

**DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY'S  
MOTION FOR SUMMARY JUDGMENT**

Defendant The Reynolds and Reynolds Company ("Reynolds") hereby moves pursuant to Fed. R. Civ. P. 56(a) and Local Rule 56.1 for summary judgment on all of Plaintiff Motor Vehicle Software Corporation's ("MVSC") claims in the above-captioned matter. In support of its Motion, Defendant submits:

1. Defendant The Reynolds and Reynolds Company's Memorandum in Support of Its Motion for Summary Judgment (filed under seal) ("Memorandum");
2. The Reynolds and Reynolds Company's Statement of Undisputed Material Facts in Support of Its Motion for Summary Judgment (filed under seal);
3. Declaration of Leo D. Caseria with accompanying Exhibits (filed under seal);
4. Declaration of Daniel L. Rubinfeld with accompanying Exhibit (filed under seal);  
and
5. Declaration of Timothy F. Bresnahan with accompanying Exhibit (filed under seal).

Reynolds also hereby incorporates by reference where specified in Reynolds's Memorandum: (1) Defendants CDK Global, LLC ("CDK") and Reynolds's Motion for Summary Judgment in *Authenticom, Inc. v. CDK Global, LLC et al.*, No. 1:18-CV-00868 (N.D. Ill.),

Defendants' Joint Statement of Common Undisputed Material Facts in Support of Their Motions for Summary Judgement, and declarations and accompanying exhibits submitted in support thereof; and (2) Reynolds's Motion for Partial Summary Judgment, Reynolds's Statement of Undisputed Facts in Support of its Motion for Partial Summary Judgment, and declarations and accompanying exhibits submitted in support thereof (previously filed at Dkt. 779, 780, 782, 783).

As demonstrated in the foregoing, there is no genuine dispute as to any material fact and Defendant is entitled to judgment as a matter of law.

WHEREFORE, Defendant respectfully requests that the Court enter an Order granting summary judgment in Defendant's favor on all of Plaintiff's claims in this matter.

[Signature block on following page]

Dated: May 20, 2020

Respectfully submitted,

/s/ Leo D. Caseria

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*Counsel for Defendant  
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**CERTIFICATE OF SERVICE**

I, Leo D. Caseria, an attorney, hereby certify that on May 20, 2020, I caused a true and correct copy of the foregoing **DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY'S MOTION FOR SUMMARY JUDGMENT** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Leo D. Caseria

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